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June 24, 2020

Via ECF

Hon. John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Jane Doe v. Darren K. Indyke and Richard D. Kahn, in their capacities as co-executors of the Estate of Jeffrey E. Epstein, and Ghislaine Maxwell, an individual, 1:20-cv-00484-JGK-DCF*

Dear Judge Koeltl:

We represent Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (together, the “Co-Executors”), in the above-referenced action. We write to further supplement the Co-Executors’ pending motion to dismiss (ECF Doc. 36) with the enclosed Opinion & Orders entered in two other personal injury actions against the Co-Executors. The first was entered earlier this month by The Hon. Edgardo Ramos in *Lisa Doe v. Darren K. Indyke and Richard D. Kahn, as Joint Personal Representatives of the Estate of Jeffrey E. Epstein, et al.* (19-cv-07773 (ER) (DCF)). The second was entered yesterday by The Hon. Katherine Polk Failla in *Jane Doe v. Darren K. Indyke and Richard D. Kahn, in their capacities as co-executors of the Estate of Jeffrey E. Epstein* (19-cv-08673 (KPF) (DCF)). In both Opinion & Orders, the sister courts grant the Co-Executors’ motions to dismiss the plaintiffs’ punitive damages claim against them as a matter of law on grounds applicable to Plaintiff’s claim for punitive damages in this action.

Respectfully submitted,

s/Bennet J. Moskowitz
Bennet J. Moskowitz

cc: Counsel of Record (via ECF)